

1 Sarah J. Walsh (Nevada Bar No. 13481)  
2 Dora V. Lane (Nevada Bar No. 8424)  
3 HOLLAND & HART LLP  
4 5441 Kietzke Lane, Suite 200  
5 Reno, NV 89511-2094  
6 Phone: 775.327.3000  
7 Fax: 775.786.6179  
8 sjwalsh@hollandhart.com  
9 dlane@hollandhart.com

10 *Attorneys for Defendants*  
11 *The City of Sparks, Nevada;*  
12 *Assistant City Manager, John Martini; and*  
13 *Chief of Police, Chris Cawforth*

14 **IN THE UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 OFFICER GEORGE FORBUSH,

17 Plaintiff,

18 v.

19 CITY OF SPARKS, NEVADA;  
20 ASSISTANT CITY MANAGER  
21 JOHN MARTINI, in his individual and  
22 official capacities; CHIEF OF POLICE CHRIS  
23 CRAWFORTH, in his individual and official  
24 capacities; DOES 1-10,

25 Defendant.

Case No.: 3:21-cv-00163-MMD-WGC

**JOINT NOTICE OF SETTLEMENT AND  
REQUEST FOR STAY**

26 ///

27 ///

28 ///

///

///

///

///

///

///

Plaintiff, George Forbush, and Defendants, the City of Sparks, Nevada; Assistant City Manager John Martini, and Chief of Police Chris Crawforth (collectively, the “Parties”) have reached a settlement to fully and finally resolve this case. The Parties’ settlement agreement contains certain obligations that must be met before the case is dismissed. Accordingly, the Parties have agreed to and are jointly requesting that the Court enter a 60-day stay of the proceedings to allow for the completion of the tasks outlined in the settlement agreement. The Parties will file a joint stipulation for dismissal with prejudice within 7 business days after the tasks are completed.

**IT IS SO STIPULATED:**

Dated: March 28, 2024.

HOLLAND & HART LLP

/s/ Dora V. Lane

S. Jordan Walsh, Esq. (SBN 13481)  
Dora V. Lane (SBN 8424)  
5441 Kietzke Lane, Suite 200  
Reno, Nevada 89511-2094

*Attorneys for Defendants*

Dated: March 28, 2024.

WERKSMAN JACKSON & QUINN LLP

/s/ Caleb E. Mason

Caleb E. Mason (admitted pro hac vice)  
Werksman, Jackson & Quinn, LLP  
888 West Sixth Street, Fourth Floor  
Los Angeles, CA 90017

Mark Kilburn (SBN 1702)  
Law Offices of Mark Kilburn  
327 S. Arlington Avenue  
Reno, NV 89501

*Attorneys for Plaintiff*

**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: April 1, 2024

HOLLAND & HART LLP  
5441 KIETZKE LANE, SUITE 200  
RENO, NV 89511-2094